

# **EXHIBIT A**

**IN THE UNITED STATES DISTRICT COURT FOR  
THE NORTHERN DISTRICT OF ILLINOIS EASTERN DIVISION**

FAHIDA KURNIAWATI and VINI  
WULANDARI, as Co-Special Administrators  
In re Lion Air Flight JT 610 Crash  
of the Estate of HARVINO, deceased,  
  
Plaintiffs,  
  
v.  
  
THE BOEING COMPANY, a corporation,  
  
Defendant.

Lead Case: I:18-cv-07687

This filing applies to  
Case No.: I:19-cv-00797

**AFFIDAVIT OF VINI WULANDARI**

Vini Wulandari, being duly sworn on oath, states as follows:

1. I am the sister of Harvino, the co-pilot/First Officer of the Lion Air crash that is the subject of this litigation against Boeing. I am also one of two co-special administrators who serve as plaintiffs in this case.

2. I have never been arrested or charged with any crime.

3. I am not an attorney.

4. Until recently, I saw my niece and nephews frequently and greatly miss our visits.

I love my niece and nephews and hope to serve their best interests as co-special administrator.

Executed this 17th day of December, 2019.



Vini Wulandari

# EXHIBIT B

**IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS  
COUNTY DEPARTMENT, LAW DIVISION**

FILED  
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2018L013938

**FAHRIDA KURNIAWATI as  
Special Administrator of the  
Estate of Harvino, deceased,**

**Plaintiff,**

**v.**

**THE BOEING COMPANY, a  
corporation,**

**Defendant**

**Case No. 2018 L 013938**

Hearing Date: No hearing scheduled

**EMERGENCY MOTION TO REMOVE VINI WULANDARI  
AS CO-ADMINISTRATOR AND  
TERMINATE ATTORNEY TOM GARDINER'S REPRESENTATION**

Fahrida Kurniawati, by and through her attorneys, Lessmeister & Samad PLLC, and pursuant to 735 ILCS 5/2-1008 Moves this Honorable Court to remove Vini Wulandari as co-administrator of the Estate of Harvino, deceased, and terminate Tom Gardiner's Representation respectfully states as follows:

1. Harvino was a pilot in the role of first officer upon Lion Air Flight 610 which on October 29, 2018 crashed into the Java Sea, resulting in the death of 189 people on board.
2. Fahrida Kurniawati is the surviving spouse of the decedent, Harvino and Harvino's next of Kin.
3. Vini Wulandari is the decedent's sister.
4. On December 28, 2018 Ms. Kurniawati and Ms. Wulandari were appointed as Co-Administrators of the Estate of Harvino. **Exhibit 1.**

5. Fahrída Kurniawati petitions this Honorable Court to terminate Vini Wulandari as co-administrator pursuant to 735 ILCS 5/2-1008. 735 ILCS 5/2-1008 provides that upon Motion “an order may be entered that the proper parties be substituted or added, and that the cause or proceeding be carried on with the remaining parties and new parties, with or without a change in the title of the cause.”

6. It is needless to have two individuals collectively act as special administrator, when Harvino’s next of kin, Ms. Fahrída Kurniawati, has been appointed and can carry out her duties as administrator.

7. The parties are all residents of Indonesia and are practicing Muslims Under Islamic law, Vini Wulandari is not entitled to any inheritance from the Estate of Harvino, nor any portion of any future settlement of judgment received in this matter. Under Islamic Law, any naturally born son, blocks and moots any right to inheritance from Harvino’s paternal sister. Chapter 4, Section 11 of the Holy Quran. The same is true under Indonesian Law: Article 854-859 of the Indonesia Civil Code.

8. Ms. Kurniawati and Harvino, share the following minor children born during their marriage:

- a. Khansa Davina Zhafirah, daughter, born June 7, 2010;
- b. Rafa Yusuf Aqilah, son, born March 19, 2012;
- c. Kahlifi Ahza Zikri, son, born February 11, 2017.

9. Therefore, Co-administrator Wulandari’s interest in these proceedings does not rise beyond the level of sentimental.

10. Fahrida Kurniawati respectfully requests that Vini Wulandari be terminated as co-special administrator of Fahrida Kurniawati's husband's estate.

11. Furthermore, Fahrida Kurniawati terminated Thomas Gardiner and his firm. **Exhibit 2**. "A client may discharge her attorney at any time, with or without cause." *Albert Brooks Friedman, Ltd. v. Malevitis*, 304 Ill. App. 3d 979, 980 (1st Dist. 1999). Mr. Gardiner has no authority to act upon Ms. Fahrida Kurniawati, the mother of the children.

12. The Federal Court presiding over the lawsuit against The Boeing Company stated that the removal of a Co-Administrator and Attorney Thomas G. Gardiner were a matter for the State Court. **Exhibit 3**.

13. The Mediation is set for November 14, 2019. The Federal Court expressed it was in the best interest to move forward with the mediation so that the Federal Court does not rule on the motion for *forum non conveniens*. **Exhibit 3**, Tr. 7-8.

14. Therefore, this matter is exigent and the removal of the Co-Administrator Vini Wulandari and Attorney Gardiner and his firm is paramount.

15. Ms. Kurniawati no longer desires Mr. Gardiner's representation and she has a right to counsel of her choice. If Mr. Gardiner is concerned as to his fee, he can file a fee petition in Federal Court. Furthermore, there is no legal basis for Vini Wulandari to remain as Co-Administrator. Thus, the argument that Mr. Gardiner still represents the Co-Administrator is superfluous. Ms. Wulandari takes nothing under Islamic Law and Harvino is survived by both his Wife and three children.

16. Furthermore, there is a conflict of interest for Mr. Gardiner to represent the Estate of Harvino in Mr. Gardiner represents passengers from that flight.

17. As stated, Harvino was a pilot in the role of first officer upon Lion Air Flight 610. In the answer to the Estate of Harvino's Complaint, Boeing has asserted affirmative defenses questioning the flight crew's conduct. **Exhibit 4.** As lawyers for the Estate of Harvino we contest, deny and will defend against the allegations. However, Mr. Gardiner cannot represent the Estate of Harvino and passengers from the flight. The mediation for the Estate of Harvino will be confidential and whatever is discussed cannot be used later on behalf of the passengers.

18. Upon information and belief, Gardiner represents passengers from Flight 610.

19. To represent both the passengers and the Estate of the first officer is a conflict of interest.

20. We would like to proceed with mediation and these conflicts of interest must be addressed along with Mr. Gardiner's termination of employment.

WHEREFORE, Fahrida Kurniawati, prays this Honorable Court to enter an order terminating Vini Wulandari as Co-Administrator of the Estate of Harvino, as well as Thomas G. Gardiner and his firm and any such further relief that is just and proper.

Respectfully submitted,

Fahrida Kurniawati as special  
administrator of the Estate of  
Harvino

James J. Lessmeister  
Jimmy A. Samad  
LESSMEISTER & SAMAD PLLC  
105 W. Adams, STE 2020  
Chicago, IL 60603  
312.929.2630  
[jsamad@lessmeisterlaw.com](mailto:jsamad@lessmeisterlaw.com)  
Attorney Code: 39294



One of her attorneys